

May 18, 2004

Cordella Ingram
Vice-President
Miami-Dade Affordable Housing Foundation
25 West Flagler
Suite 750
Miami, FL 33130

RE: REQUEST FOR ADVISORY OPINION 04-78

Dear Ms. Ingram:

The Commission on Ethics and Public Trust considered your request for an advisory opinion at its meeting on May 17, 2004 and rendered its opinion based on the facts stated in your letter.

You requested an opinion regarding any conflicts created between your service as a board member of the Affordable Housing Foundation and your work with the Local Initiatives Support Corporation.

In your request, you advised the Commission that you serve as a program officer for the Local Initiatives Support Corporation (LISC). LISC is a national organization that provides money for local affordable housing programs. LISC is currently providing financing to several local community development corporations. The Miami-Dade Housing Agency is awarding LISC a contract to create homeownership counseling centers in several

locations throughout the county. The homeownership programs will provide various services including credit counseling and mortgage information. The Affordable Housing Foundation will operate the Overtown Center.

The Affordable Housing Foundation was created by the Miami-Dade County Housing Finance Authority to provide financing for affordable housing projects. The Affordable Housing Foundation also provides homeownership education programs around the county. You serve as a member of the Board of Directors of the Affordable Housing Foundation and the Housing Finance Authority. The Board of Directors sets policy and is not involved in securing contracts or financing for the organization.

As a LISC employee, you are responsible for administering grants, coordinating training for community development corporations and fund-raising. Although you will have responsibility for administering the grant for the homeownership counseling centers, an outside consultant will handle day-to-day administration of the program.

The Commission found the Conflict of Interest and Code of Ethics ordinance permits you to serve in both capacities. However, in order to avoid potential conflicts, you should relinquish any management responsibilities related to the Affordable Housing Foundation's contract with LISC. Further, you may not disclose any confidential information acquired as a result of LISC's work as a county contractor or use your position as a county contractor to secure special benefits for any organization.

This opinion construes the Miami-Dade Conflict of Interest and Code of Ethics ordinance only and is not applicable to any conflict under state law. Please contact the State of Florida Commission on Ethics if you

have any questions regarding possible
conflicts under state law.

If you have any questions regarding the
opinion, please call the undersigned at (305)
579-2954 or Ardyth Walker, Staff General
Counsel at (305) 579-2653.

Sincerely Yours,

ROBERT MEYERS
Executive Director